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9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

11 In re

12 **VERITY HEALTH SYSTEM OF CALIFORNIA,
INC., et al.,**

13 **Debtors and Debtors in Possession.**

14 Affects All Debtors
15 Affects Verity Health System of California, Inc.
 Affects O'Connor Hospital
 Affects Saint Louise Regional Hospital
 Affects St. Francis Medical Center
 Affects St. Vincent Medical Center
 Affects Seton Medical Center
 Affects O'Connor Hospital Foundation
 Affects Saint Louise Regional Hospital Foundation
 Affects St. Francis Medical Center of Lynwood
16 Foundation
 Affects St. Vincent Foundation
 Affects St. Vincent Dialysis Center, Inc.
 Affects Seton Medical Center Foundation
 Affects Verity Business Services
 Affects Verity Medical Foundation
 Affects Verity Holdings, LLC
 Affects De Paul Ventures, LLC
 Affects De Paul Ventures - San Jose Dialysis, LLC

17 Lead Case No. 2:18-bk-20151-ER

18 Jointly administered with:
19 Case No. 2:18-bk-20162-ER;
Case No. 2:18-bk-20163-ER;
Case No. 2:18-bk-20164-ER;
Case No. 2:18-bk-20165-ER;
Case No. 2:18-bk-20167-ER;
Case No. 2:18-bk-20168-ER;
Case No. 2:18-bk-20169-ER;
Case No. 2:18-bk-20171-ER;
Case No. 2:18-bk-20172-ER;
Case No. 2:18-bk-20173-ER;
Case No. 2:18-bk-20175-ER;
Case No. 2:18-bk-20176-ER;
Case No. 2:18-bk-20178-ER;
Case No. 2:18-bk-20179-ER;
Case No. 2:18-bk-20180-ER;
Case No. 2:18-bk-20181-ER

20 Chapter 11 Cases

21 Hon. Ernest M. Robles

1 ST. VINCENT MEDICAL CENTER, a California
2 nonprofit public benefit corporation, SETON
3 MEDICAL CENTER, a California nonprofit
4 public benefit corporation, O'CONNOR
HOSPITAL, a California nonprofit public benefit
corporation, and SAINT LOUISE REGIONAL
HOSPITAL, a California nonprofit public benefit
corporation,

5 Plaintiffs,
6 v.

7 CALIFORNIA PHYSICIANS' SERVICE dba
8 BLUE SHIELD OF CALIFORNIA, a California
nonprofit public benefit corporation,

9 Defendant.

10 Adversary No. 20-ap-01575-ER

11 **STIPULATION TO CONTINUE HEARING
ON DEFENDANT'S MOTION TO (1)
DISMISS CLAIMS FOR TURNOVER,
VIOLATION OF THE AUTOMATIC STAY
AND UNJUST ENRICHMENT; AND (2)
COMPEL ARBITRATION AND STAY
ADVERSARY PROCEEDING**

12 [Related to Docket No. 13]

13 Present Hearing:

14 Date: November 24, 2020
Time: 11:00 a.m.
Place: Courtroom 1568
255 East Temple Street
Los Angeles, CA 90012

15 The Parties to the above-encaptioned adversary proceeding, plaintiffs St. Vincent
16 Medical Center, Seton Medical Center, O'Connor Hospital, and Saint Louise Regional Hospital
17 (collectively, "Plaintiffs") and defendant California Physicians' Service dba Blue Shield of
18 California ("Defendant"), by and through their respective counsel, hereby stipulate as follows:

19 1. Plaintiffs instituted this adversary proceeding through the filing of their *Complaint for*
20 *Breach of Written Contracts, Turnover, Unjust Enrichment, and Damages for Violation of the*
21 *Automatic Stay* on August 28, 2020 (the "Complaint") [Docket No. 1].

22 2. Following an extension of time granted to Defendant to respond to the Complaint, on
23 October 30, 2020, Defendant filed its *Motion to: (1) Dismiss Claims for Turnover, Violation of the*
24 *Automatic Stay and Unjust Enrichment; and (2) Compel Arbitration and Stay Adversary Proceeding*
25 (the "Motion") [Docket No. 13], set for hearing on November 24, 2020 at 11:00 a.m.

26 3. Plaintiffs and Defendant are seeking to consensually resolve the issues raised in the
27 Motion without the need for further litigation thereof, including the filing of an opposition to the
28 Motion, and therefore request that the hearing on the Motion be continued to December 16, 2020 at
11:00 a.m. so as to facilitate those efforts.

4. Plaintiffs and Defendant further stipulate and agree that any opposition to the Motion
shall be filed and served no later than November 25, 2020.

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2 Dated: November 10, 2020

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4 PACHULSKI STANG ZIEHL & JONES LLP

5 /s/ Steven J. Kahn

6 Steven J. Kahn

7 Counsel for St. Vincent Medical Center, Seton Medical
Center, O'Connor Hospital, and Saint Louise Regional
Hospital

8 Dated: November 9, 2020

9 SNELL & WILMER LLP

10 

11 Michael B. Reynolds

12 Andrew B. Still

13 Counsel for California Physicians' Service dba Blue
14 Shield of California

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Boulevard, 13th Floor, Los Angeles, California 90067

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO CONTINUE HEARING ON DEFENDANT'S MOTION TO (1) DISMISS CLAIMS FOR TURNOVER, VIOLATION OF THE AUTOMATIC STAY AND UNJUST ENRICHMENT; AND (2) COMPEL ARBITRATION AND STAY ADVERSARY PROCEEDING** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **November 10, 2020**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Steven J Kahn** skahn@pszyjw.com
- **Michael B Reynolds** mreynolds@swlaw.com, kcollins@swlaw.com
- **Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 10, 2020
Date

Mary de Leon
Printed Name

/s/ Mary de Leon
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.